REMARKS

In response to Examiner's remarks:

(i.) Claims 7, 8 and 24 have been cancelled; and

(ii.) Claim 1 has been amended by inserting subject matter of originally filed claim 4 into claim 1, whereby new sub-paragraph (d) provides antecedent basis for a polyimide-to-metal ("PTM") bonding layer.

Regarding the 35 USC 103 rejection, Applicant requests favorable reconsideration for the following reasons.

The Office Action mentions that, "Effenberger et al show that FEP and blends of PTFE and PFA are functionally equivalent materials for the practice of their invention. Therefore, because these two materials were art-recognized equivalents at the time the invention was made, one of ordinary skill in the art would have found it obvious to substitute FEP for one of the PTFE/PFA blend layers." See, July 18, 2005 Office Action, Page 5, lines 1-5.

Applicant's invention however has advanced the art beyond such an understanding. As illustrated in the comparative examples of the application, FEP and PFA are not functionally equivalent materials, at least for purposes of the present invention. In accordance with the present invention, PFA has greater utility (relative to FEP) in the high temperature bonding layer, and FEP has greater utility (relative to PFA) in the polyimide to metal bonding layer.

Effenberger teaches against metal bonding (and therefore teaches against the present invention) by teaching that "... to avoid bonding of any fluoropolymer layers of the claimed composite to the conductor itself during tape wrapping, it is desirable that the face of the interior layer adjacent to the conductor contain PTFE alone...." See, Effenberger, col. 5, lines 28-32. Applicant does not use FEP and PFA interchangeably (as taught by Effenberger), but rather, Applicant applies FEP and PFA in specialized ways that enables a composite structure that is bonded to the conductor (contrary to the teachings of the Effenberger reference).

Effenberger requires adhesive layers having at least 40% PTFE, whereas the present invention only allows PTFE as an optional component at levels less than 40%. Hence, the adhesive chemistry is much different (Effenberger requires adhesives having at least 40%

PTFE, while the present invention optionally comprises PTFE at levels less than 40%), where Applicant's invention includes bonding to the conductive member (contrary to the teachings of Effenberger).

Effenberger does not disclose a cut resistant wire wrap in general, and more specifically, does not disclose Applicant's cut resistant wire wrap. Applicant's invention is an advance over Effenberger, since the present invention is not only cut resistant (relative to the Effenberger teaching), but also, the present invention does not require the extreme thermal treatment of Effenberger (see, Effenberger col. 7, lines 5-9). There is no motivation to modify Effenberger by: i. eliminating the extreme thermal treatment (of Effenberger), ii. bonding the wrap to the wire (contrary to the teachings of Effenberger), or iii. using FEP and PFA in a way that is not inter-changeable (contrary to the teachings of Effenberger) to obtain a wire wrap with improved cut resistance relative to Effenberger. Indeed, the 'cut resistance' problem address by the present invention is much different than the adhesion problem addressed by Effenberger, who may not have appreciated the problem addressed by the present invention. Hence, there is no actual or inherent motivation found within Effenberger to modify the teachings of Effenberger in a way that would lead to the advance over Effenberger provided by present invention.

In view of the foregoing, allowance of the above-referenced application is respectfully requested.

Respectfully submitted,

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